

EXHIBIT B

DEBRA STOCKTON on 01/19/2017

30(b)(6)

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION
4 RUBEN MARTINEZ, JR.,)
5 Plaintiff,)
6 VS.) CIVIL ACTION
7 REALPAGE, INC.,) NO.: 4:16-CV-00349-ALM
8 Defendant.)
9 -----

10 30(b)(6) ORAL DEPOSITION OF

11 REALPAGE, INC.

12 BY AND THROUGH DEBRA STOCKTON

13 JANUARY 19, 2017

14 VOLUME 1
15 -----
16
17 ORAL DEPOSITION OF REALPAGE, INC., produced as a
18 witness at the instance of the PLAINTIFF, and duly sworn,
19 was taken in the above-styled and numbered cause on
20 January 19, 2017, from 10:52 a.m. to 4:00 p.m., via
21 videoconference, before Kim A. McCann, CSR in and for the
22 State of Texas, reported by machine shorthand, at the
23 Renaissance Dallas Richardson Hotel, 900 E. Lookout
24 Drive, Richardson, Texas, pursuant to the Federal Rules
25 of Civil Procedure.

Maxene Weinberg Agency

(800)-640-1949

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1 we have the response itself.

2 Q. The court reporter has it.

3 (Exhibit 2 was marked.)

4 A. Okay. I have the documents.

5 Q. Okay. Exhibit 2, that's the

6 RealPage's Responses to Plaintiff's First Set of

7 Interrogatories, correct?

8 A. Correct.

9 Q. Would you turn to page 4.

10 A. Okay.

11 Q. And in that first paragraph, there's

12 a quotation. Let's see. Go down one, two,

13 three, four, five -- six lines.

14 And this is information that RealPage

15 is stating about the Wisconsin Sex Offender

16 Registry, correct?

17 A. This and -- this language is

18 contained in the -- can I look at the page

19 before?

20 MR RAETHER: Yeah.

21 Q. Sure.

22 A. Yeah. So this is language that's

23 contained with a disclosure that goes along with

24 the consumer report.

25 Q. That's right. But there wasn't any

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1 disclosure that went along with the consumer

2 report to Stonebridge, was there?

3 A. Yes, there is.

4 Q. But you just said the consumer report

5 is the four pages that's contained on pages 2

6 through 5?

7 A. So there's a hyperlink. So if you'll

8 look on page 5.

9 Q. Yes.

10 A. Highlighted in green there's a

11 disclosure from jurisdictions returning results.

12 Q. I see that.

13 A. And so that's what this is referring

14 to.

15 Q. Okay.

16 A. And so if the client clicks on that,

17 they would see something that contains this

18 language.

19 Q. All right. They would have to click

20 on it to see, correct?

21 A. That's correct.

22 Q. I think the point I wanted to make

23 was in this paragraph on page 4 of the

24 supplemental response, you state: "Instead of

25 providing the date of birth, this jurisdiction